

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
MEDFORD DIVISION

Julie M. Joki,

Case No. 08-849-CL

Plaintiff,

A F F I D A V I T

v.

of Peter Angstadt, Ph.D.
in Support of Motion for
Summary Judgment
by Defendant Angstadt

**Rogue Community College;
Dr. Peter Angstadt, President
Of Rogue Community College;
Denise Swafford; Cindy
Hauser; Verne Underwood;
Michael Laam; and Galyn
Carlile;**

Defendants.

State of Oregon)
) ss.
County of Jackson)

I, Peter Angstadt, Ph.D., being first duly sworn, do depose and say as follows:

1. I am over the age of 18, and I make this affidavit based on personal knowledge of the facts contained herein.

2. I am a named defendant in the above-entitled matter. I currently am the President of Rogue Community College (RCC). I have been the President of RCC since June 2004.

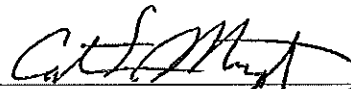
3. I had very limited interaction with the plaintiff during her employment with RCC. My only interaction with the plaintiff outside of standard faculty interactions involved her Level II Grievance. As President of RCC, it is my responsibility to resolve Level II Grievances. When the plaintiff initiated her Level II Grievance, my only objective was to resolve the situation so that everyone could move forward. I made the decision to withdraw her Letter of Reprimand from her personnel file and to reassign her supervision in an effort to resolve the plaintiff's complaints. I believed that the actions I took surrounding the Level II Grievance emphasized that no potentially discriminatory or retaliatory conduct is ever tolerated at RCC.

4. I treated the plaintiff in the same way I would treat any individual under the particular circumstances. I never treated her differently because she was female, I never treated her differently in retaliation for any of her actions, and I never acted with intent to cause the plaintiff emotional distress.



Peter Angstadt, Ph.D.

SUBSCRIBED and SWORN to before me this 24 day of August, 2011.



Notary Public for Oregon

My Commission Expires: April 2, 2013

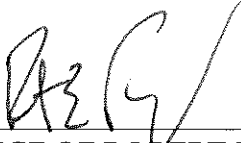
CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing AFFIDAVIT OF PETER ANGSTADT, Ph.D. IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT BY DEFENDANT PETER ANGSTADT on Plaintiff on Tuesday, August 30, 2011, by notice of electronic filing using the CM/ECF System:

Ms. Marianne Dugan
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Of Attorneys for Plaintiff

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Of Attorneys for Plaintiff

Dated: Tuesday, August 30, 2011.



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Of Attorneys for Defendants

I hereby certify that this document is a true and correct copy of the original.

Robert E. Franz, Jr.